

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**WEST VIRGINIA RIVERS
COALITION, INC.,**

Plaintiff,

v.

Civil Action No. 2:24-cv-00701

THE CHEMOURS COMPANY FC, LLC,

Defendant.

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

For the reasons set forth in the memorandum accompanying this motion and the attached exhibits, pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff respectfully requests that the Court issue a preliminary injunction against Defendant, prohibiting Defendant from committing further violations of the hexafluoropropylene oxide dimer acid ("HFPO-DA") effluent limitations at Outlets 002 and 005 of WV/NPDES Permit WV0001279 and compelling Defendant to achieve compliance by any means necessary, including (1) reducing the production that generates process wastewater containing HFPO-DA, and/or (2) sending process wastewater off-site for disposal by deep-well injection or incineration.

DATED: February 25, 2025

Respectfully submitted,

/s/ Derek Teaney

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CERTIFICATE OF SERVICE

I, Derek O. Teaney, do hereby certify that, on February 25, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system, which will notify the following participants:

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